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Attorneys for Defendant,  
**MICHAEL SCOTT WOODS, M.D.**  
(erroneously sued and served herein as  
**DR. SCOTT WOODS**)

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

**JULIA HUBBARD and KAYLA**  
**GOEDINGHAUS,**  
  
Plaintiffs,  
  
v.  
  
**TRAMMELL S. CROW, JR., et al.,**  
  
Defendants.

Case No. 2:22-cv-7957-FLA-MAA

**STIPULATION TO EXTEND THE  
TIME FOR DEFENDANT MICHAEL  
SCOTT WOODS, M.D. TO  
RESPOND TO THE INITIAL  
COMPLAINT BY NOT MORE  
THAN 30 DAYS [L.R. 8-3.]**

Complaint Served: January 3, 2023  
Current Response Date: January 24, 2023  
New Response Date: February 8, 2023

Judge: Hon. Fernando L. Aenlle-Rocha  
Courtroom: 6B

**TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF  
RECORD:**

Pursuant to Local Rules 7-1 and 8-3, Plaintiffs Julia Hubbard and Kayla  
Goedinghaus ("Plaintiffs"), by and through their counsel, and Defendant Michael  
Scott Woods, M.D. (erroneously sued and served herein as DR. SCOTT WOODS)  
("Woods") (collectively "the Parties"), hereby stipulate as follows:

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**RECITALS**

WHEREAS, on November 1, 2022, Plaintiffs filed the Complaint in the above- entitled action. (ECF No. 1.)

WHEREAS, on or about January 3, 2023, Plaintiffs served defendant Woods with the Complaint.

WHEREAS, Woods' response to the Complaint based on the aforementioned service date was due on January 24, 2023.

WHEREAS, Woods' California counsel was just retained and is in the process of obtaining the file so as to be able to properly respond to the Complaint and thus requires additional time to answer or otherwise respond to the Complaint, as well as comply with Local Rule 7-3.

**STIPULATION**

IT IS HEREBY STIPULATED, by and between Plaintiffs and Woods as follows:

Woods shall have an additional fifteen (15) days to answer or otherwise respond to the Complaint, to and including February 8, 2023. This stipulation shall constitute a special appearance by Woods and shall not waive any defenses relating to personal jurisdiction, forum or venue, consistent with Section 418.10 of the California Code of Civil Procedure and FRCP 28 USC 1406 et seq.

[SIGNATURES FOLLOW ON NEXT PAGE]

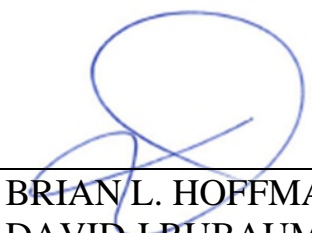
1 DATED: January 25, 2023

BALESTRIERE FARIELLO LLP  
KABATECK LLP

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4 By: /e/ Anastasia K. Mazella  
5 JOHN G . BALESTRIERE  
6 MATTHEW W. SCHMIDT  
7 ANASTASIA K. MAZELLA  
8 Attorneys for PLAINTIFFS  
9

10 DATED: January 25, 2023

WOOD, SMITH, HENNING & BERMAN LLP

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12  
13 By:   
14 BRIAN L. HOFFMAN  
15 DAVID J. RUBAUM  
16 Attorneys for Defendant MICHAEL SCOTT  
17 WOODS, M.D.  
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**ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)**

Pursuant to Local Rule of Civil Procedure 5-4.3.4(a)(2)(i), the filer of this document attests that all the other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: January 25, 2023

WOOD, SMITH, HENNING & BERMAN LLP

By: 

BRIAN L. HOFFMAN

DAVID J. RUBAUM

Attorneys for Defendant MICHAEL SCOTT  
WOODS, M.D.

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**PROOF OF SERVICE**

**Hubbard v. Crow**  
**Case No. 2:22-cv-7957-SK**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 10960 Wilshire Boulevard, 18th Floor, Los Angeles, CA 90024-3804.

On January 25, 2023, I served the following document(s) described as **STIPULATION TO EXTEND THE TIME FOR DEFENDANT MICHAEL SCOTT WOODS, M.D. TO RESPOND TO THE INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS [L.R. 8-3.]** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 25, 2023, at Los Angeles, California.

/s/ Jessica Avila Gonzales

\_\_\_\_\_  
 Jessica Avila Gonzales

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